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February 7, 2024

**Via Electronic Filing**

The Hon. John G. Koeltl, U.S.D.J.  
U.S. District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Rene v. 31 East 21 Express Inc. et al.*  
Case No.: 21-cv-7435 (JGK) (KHP)

Dear Honorable Judge Koeltl:

This law firm represents Defendants Pun San Laan Inc. (the “Corporate Defendant”) and Thanaphan Laonutwuttikul (the “Individual Defendant”, and together, the “Nana Thai Defendants”) in the above-referenced action. This letter is submitted jointly with counsel for Plaintiff Claudio Rene (the “Plaintiff”).

Pursuant to Your Honor’s Individual Motion Practice Rules this joint letter respectfully serves to request an extension of time to file the parties’ motion to approve the settlement agreement pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015) from February 7, 2024 to, through and including, February 14, 2024.

This is the second request of its nature. If granted, this request would not affect any other Court scheduled deadlines.

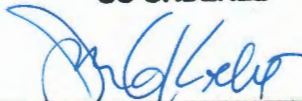
The basis of this request is that the parties require additional time to finalize the terms of a long-form settlement agreement, and the letter motion for *Cheeks* approval.

We thank the Court for its attention to this matter, and are available at the Court’s convenience to answer any questions related to the foregoing.

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi  
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*Attorneys for the Nana Thai Defendants*

**APPLICATION GRANTED  
SO ORDERED**

  
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John G. Koeltl, U.S.D.J.

2/8/24